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December 6, 2021

VIA ECF

Honorable Arlene Rosario Lindsay
United States Magistrate Judge
United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, New York 11722

Re: *Robert Goldblatt v. New York Institute of Technology,*
2:18-cv-00265 (DRH)(ARL)

Dear Judge Lindsay:

This firm represents defendant New York Institute of Technology ("NYIT") in this action. I write on behalf of counsel for the parties to respectfully request an extension of the parties' deadline to complete discovery from December 8, 2021 until February 15, 2021. Plaintiff is providing a HIPAA authorization early this week that NYIT will use to promptly subpoena Plaintiff's medical records. Should the parties be granted an extension, counsel have scheduled Plaintiff's deposition for January 11, 2022. The parties require this additional time to obtain these medical records and complete depositions. Plaintiff's counsel intends to depose approximately two individuals. This is the parties' third request for an extension of the discovery schedule and intend for it to be the final request.

Should Your Honor grant the parties' request for an extension of the discovery deadline, counsel for the parties respectfully request that the December 22, 2021 deadline to take the first step in any dispositive motion practice be adjourned to March 1, 2022. Counsel for the parties also respectfully request that the final conference before Your Honor on January 10, 2022 be adjourned until a date that is convenient to Your Honor after the end date of discovery.

Thank you for Your Honor's consideration of the parties' request.

Respectfully Submitted,
CLIFTON BUDD & DeMARIA, LLP
Counsel for NYIT

By: *Stefanie Toren*
Douglas Catalano
Stefanie Toren

cc: Gregory A. Tsonis, Esq.